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2 Holger Uhl [OSB#950143]
3 **McCarthy & Holthus LLP**
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Attorneys for First Horizon Home Loan Corporation

6 **IN THE UNITED STATES DISTRICT COURT**
7 **DISTRICT OF OREGON**
8 **MEDFORD DIVISION**

9 TAMIE RICHARDSON,
10 vs. Plaintiff,
11 First Horizon Home Loan Corporation,
12 Defendants.

Case No. 10-03073

MOTION FOR PROTECTIVE ORDER

13 COME NOW the Defendant by and through its attorney of record, represented by and through
14
15 Holger Uhl of McCarthy & Holthus, LLP and pursuant to Rules of Civil Procedure 26 and moves for a
16 Protective Order related to Plaintiffs' discovery request and depositions. This Motion is based upon the
17 following:

- 18 1. That Defendant has complied with all reasonable requests of Plaintiff with respect to
discovery.
- 21 2. That Plaintiff's Requests for production are unreasonable and brought solely in order to
annoy or embarrass and cause undue expenses to the Defendant, including but not limited to the
23 following reasons:
- 24 a. Plaintiff's request seeks originals even after verified copies have been produced.
25 b. Plaintiff seeks documents which are not relevant to the subject matter involved in the
26 pending action, documents of public record which are equally accessible to all parties.

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RESPONSE IN OPPOSITION
FACTS - 1

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3 c. Based on the stated intentions of Plaintiff, the scheduled depositions are not likely to
4 produce any relevant or admissible evidence. The sole purpose of those depositions is to
5 intimidate employees, to increase the costs of litigation and to avoid a final decision by the
6 court.
7
8 3. Therefore, Defendant seeks order from this Court that no further discovery be had and/or the
9 alternative that Plaintiffs advance reasonable costs to Defendants for time and money extended
10 in compiling the records and copying the records requested.
11
12 4. Plaintiff does not have a “substantial need” for the discovery requested.
13
14 5. In the alternative if the court is not inclined to grant a blanket protective order, Defendant
15 respectfully requests that discovery be stayed until the Court rules on Defendant’s pending
motions to dismiss or order mediation.

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17 DATED March 9, 2011
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McCarthy & Holthus, LLP

/s/ *Holger Uhl*

By _____

Holger Uhl, Of the Firm

Attorneys for First Horizon Home Loan Corporation

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RESPONSE IN OPPOSITION
FACTS - 2

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2 **CERTIFICATE OF SERVICE**
3

4 I HEREBY CERTIFY that on March 9, 2011, I served a copy of the foregoing on CM/ECF Registered Participants
5 as reflected on the Notice of Electronic Filing:
6

7 •
8

9 Additionally, a copy of the foregoing was served on the following parties by first class mail, postage prepaid,
10 addressed to:
11

12 **Tamie Richardson**
13 746 Bailey Drive
14 Grants Pass, OR 97527
15

16 */s/ Holger Uhl*
17

18

19 Holger Uhl
20

21 **RESPONSE IN OPPOSITION**
22 FACTS - 3
23

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